

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Misc. No. \_\_\_\_\_

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| In re:<br><br>Stream TV Networks, Inc., <sup>1</sup><br><br>Debtor.  | Chapter 11<br><br>Bky. No. 23-10763 (MDC)                               |
| In re:<br><br>Technovative Media, Inc.,<br><br>Debtor.   | Chapter 11<br><br>Bky. No. 23-10764 (MDC)<br><br>(Jointly Administered) |
| STREAM TV NETWORKS, INC. and<br>TECHNOVATIVE MEDIA, INC.,<br><br>Plaintiffs,<br>v.<br><br>SHADRON L. STASTNEY, SLS HOLDINGS VI,<br>LLC, HAWK INVESTMENT HOLDINGS<br>LIMITED, ARTHUR LEONARD ROBERT "BOB"<br>MORTON, SEECUBIC, INC., ALASTAIR<br>CRAWFORD, KRZYSZTOF KABACINSKI,<br>KEVIN GOLLOP, ASA GOLA, JOHN DOE(S),<br>JANE DOE(S), DELAWARE and OTHER LAW<br>FIRMS representing and acting in concert with John<br>Doe(s) and/or Jane Doe(s), INVESTMENT BANKS<br>employed by John Doe(s) and/or Jane Doe(s),<br>PATRIC THEUNE, and SEECUBIC B.V.,<br>Defendants. | Adv. No. 23-00057   |

**MOTION OF DEBTORS FOR WITHDRAWAL OF REFERENCE**

Stream TV Networks, Inc. ("Stream" and the "Company") and Technovative Media, Inc. (Technovative) and collectively with Stream, the "Plaintiffs" or "Debtors") hereby files this

<sup>1</sup> The Debtors, together with the last four digits of the Debtors' federal tax identification numbers, are Stream TV Networks, Inc. (...4092) and Technovative Media, Inc. (...5015). The location of the Debtors' service address is: 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

Motion for Withdrawal of Reference (“Motion”), and in support thereof states as follow:

1. Debtors will rely upon the Brief in Support of Motion of Debtors for Withdrawal of Reference, filed herewith, and the oral argument of counsel, if any, on the return date.
2. For the reasons stated in their Brief in Support filed contemporaneously herewith, the Debtors respectfully request that the Court grant their Motion, withdraw the reference, and determine that all future matters in this proceeding are to be heard by the District Court.

Dated: August 30, 2023

Respectfully submitted,

/s/ Rafael X.Zahralddin  
Rafael X. Zahralddin-Aravena (PA Bar No. 71510)  
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